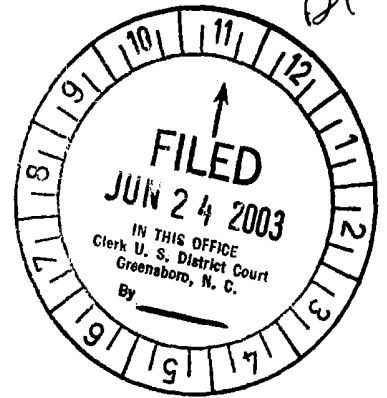


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
Salisbury Division

No. **1:03-cv-00592**



Charles F. Lambeth, Jr., and)
Michael D. Lea,)

Plaintiffs)

vs.)

COMPLAINT

The Board of Commissioners)
of Davidson County, North)
Carolina,)

Defendants)

Plaintiffs, complaining of Defendant, say:

1. This is an action to remedy the deprivation, under color of State law, of rights secured to Plaintiffs by the Establishment Clause of the First Amendment to the United States Constitution. It is brought pursuant to 42 U.S.C. 1983. This Court has subject matter jurisdiction pursuant to 28 U.S.C. 1331 and 1343.

2. The individual Defendants are sued in the capacity of their offices.

3. Since on or about December 31, 2002, the Defendants have prominently displayed "In God We Trust" in 18 inch block letters on the front pediment of the Davidson County Government Building, the seat of the government of Davidson County, North Carolina. This display is readily visible to all who enter the building.


4. The installation and continued maintenance of this display violates the Establishment Clause of the First Amendment to the United States Constitution.

5. The Plaintiffs are each licensed North Carolina attorneys who live and practice law in Davidson County, North Carolina. Each has contact with the display in the course of his professional activities in Davidson County. Each is offended by the display, which is to him a religious statement by the County government.

6. Plaintiffs have no plain, adequate or complete remedy at law for the unconstitutional actions of Defendant.

WHEREFORE, Plaintiffs pray that the Court declare the maintenance of the display of "In God We Trust" unconstitutional, order that it be removed, and award Plaintiffs their costs, counsel fees, and other relief as merited.

Respectfully submitted, June 24, 2003.

A handwritten signature in cursive script, appearing to read "George Daly", is written over a horizontal line.

George Daly
139 Altondale Avenue
Charlotte NC 28207
Tel/Fax: 704-333-5196
N.C. Bar No. 1071

Attorney for Plaintiff